

1 JONATHAN A. PATCHEN (SBN 237346)  
TAYLOR & PATCHEN, LLP  
2 One Ferry Building, Suite 355  
San Francisco, California 94111  
3 Telephone: (415) 788-8200  
Facsimile: (415) 788-8208  
4 E-mail: jpatchen@taylorpatchen.com

5 Attorneys for Non-Party LIOR RON

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7 **UNITED STATES DISTRICT COURT**  
8 **NORTHERN DISTRICT OF CALIFORNIA**  
9 **SAN FRANCISCO DIVISION**  
10

11 WAYMO, LLC,

12 Plaintiff,

13 vs.

14 UBER TECHNOLOGIES, INC;  
15 OTTOMOTTO LLC; and OTTO TRUCKING  
LLC,

16 Defendants.  
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Case No.: 3:17-CV-00939 (WHA)

**DECLARATION OF JONATHAN  
PATCHEN IN SUPPORT OF NONPARTY  
LIOR RON'S ADMINISTRATIVE  
MOTION TO FILE UNDER SEAL**

Magistrate Judge Jacqueline S. Corley

1 I, JONATHAN PATCHEN, declare as follows:

2 1. I am a partner in the law offices of Taylor & Patchen, LLP, a member in good  
3 standing of the bar of the State of California, and am admitted to practice before the United States  
4 District Court for the Northern District of California. I have personal knowledge of the matters set  
5 forth in this declaration, and if called upon to testify as a witness in this case, I could and would  
6 testify competently under oath to all of the matters set forth in this declaration.

7 2. This declaration is submitted in support of Nonparty Lior Ron's Administrative  
8 Motion to File Under Seal confidential information in his Letter Brief in Response to Waymo's  
9 Motion to Compel Inspection of Images ("Response").

10 3. Specifically, Mr. Ron's Response contains information, highlighted in yellow in the  
11 footnote at page 1 that make reference to materials designated as "Confidential" and/or "Highly  
12 Confidential" by Defendants, Anthony Levandowski, and/or other third parties to this action.  
13 These materials are attached as Exhibit 2 to Waymo's Motion to Compel Inspection of Images,  
14 filed under seal at Dkt. 1785-2.

15 4. Also, Mr. Ron's Response contains information, highlighted in yellow in Exhibit 1  
16 to the Declaration of Jonathan Patchen that make reference to materials designated as  
17 "Confidential" and/or "Highly Confidential" by Defendants, Anthony Levandowski, and/or other  
18 third parties to this action.

19 I declare under penalty of perjury, under the laws of the United States of America, that the  
20 foregoing is true and correct. Executed this 26th day of September, 2017, at San Francisco,  
21 California.

22  
23 /s/ Jonathan A. Patchen  
24 JONATHAN A. PATCHEN